

# EAST BAY BICYCLE COALITION

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Christopher Calfee, Special Counsel  
ATTN: CEQA Guidelines  
California Resources Agency  
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Sacramento, CA 95814  
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Dear Mr. Calfee:

The East Bay Bicycle Coalition strongly urges the Natural Resources Agency to stick with the Governor's Vehicle Miles Traveled (VMT) approach to revisions in the Transportation/Traffic section of the CEQA Guidelines. The focus of *SB 375 - Redesigning Communities to Reduce Greenhouse Gases* is on reducing Vehicle Miles Traveled (VMT), and all transportation planning agencies and cities are required to develop plans to achieve this goal. There is no reason that CEQA-California's leading environmental legislation—should avoid this necessary and crucial approach to environmental protection. Please reinstate the Governor's initial draft language that focused on "increases in traffic."

A new Paragraph (h) should be added to XVI. Transportation/Traffic of CEQA Guidelines that says: "Negatively impact bicycling and walking."

Paragraph (a) with its focus on "capacity" has been interpreted by planners and traffic engineers as an analysis of vehicle capacity. And for good reason, capacity is not really an issue for bicyclists and pedestrians. "Safety" and "access" are the paramount issues for bicyclists and pedestrians, and no paragraph in the Transportation Guidelines requires an equivalent analysis of the safety and access impacts on bicycling and walking. In fact, the current focus on capacity runs counter to the provision of access and safety for bicyclists and pedestrians. For example, widening of roadways often precludes bike lanes and makes pedestrian crossings more dangerous.

In fairness, all modes of transportation should be studied for potential impacts. We are not calling for new and complex multimodal level of service analysis, rather a straightforward analysis focused on safety and access. Your own *"Statement of Reasons for Regulatory Action"* acknowledges that reliance on level of service may not be the best measure to assess "the overall effectiveness of the circulation system as a whole."

In paragraph (a) please strike "exceed the capacity" and replace it with "impact the overall effectiveness." Without this language enabling access and safety to be elevated as an impact, we see little hope for the amended Transportation Guidelines to reduce Greenhouse Gas Emissions. The explanatory language in your *Statement of Reasons* repeats that the intended emphasis is on the "overall effectiveness of the transportation system" with a consideration of all modes of

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travel. Paragraph (a) should directly capture this intent and thereby underscore the goal to expand the analysis of traffic impacts beyond a limited "capacity" analysis.

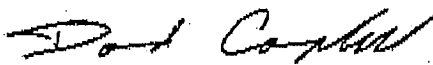
We have a few additional requests for language changes. In paragraph (a), in addition to our suggestion that VMT be the focus of this paragraph, as originally proposed by the Governor's office, we propose changing the term "bicycle paths" to "bikeways." According to the *Caltrans Highway Design Manual*, bikeway is an inclusive term for all types of bicycle facilities, of which a bicycle path is just one type. Bikeways also include Class III shared bike routes and Class II bike lanes. It is the intent of the current language to require a consideration of non-GHG emitting roadway users, which includes bicyclists riding in a travel lane or in a bike lane. Bikeways is the correct term to use.

Paragraph (g) should be amended to eliminate "(e.g. bus turnouts, bicycle racks)" and replaced with "(transit, bicycling and walking)." Many projects to date have unfortunately added only a bicycle rack as a modest effort to comply with adopted bicycle plans, which is insulting and far from any reasonable effort to include safe bicycle travel as a necessary mitigation or integral part of project design.

We have discussed these changes with Dennis Fay and Beth Walukas of the Alameda County Congestion Management Agency and they are in agreement with our proposed changes to paragraphs (a), (g) and (h). They still have concerns about focusing on VMT as opposed to capacity and on this point we have disagreements. Mitigating a development proposal by increasing the capacity of nearby roadways is like dealing with obesity by loosening your belt. Because level of service is not an environmental impact, we are confident that transportation planners in years to come will recognize the wisdom of focusing on VMT reduction rather than on roadway capacity. We also hope that you will start this process. If you don't do it, transportation planners will have to do it anyway as part of SB 375. It's time to change the approach and it's time for you to take the lead on this.

Thank you for your consideration and support.

Sincerely,



Dave Campbell, Chair  
East Bay Bicycle Coalition